

ORIGINAL

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

FEB 16 2006

at 4 o'clock and 1 min P M  
SUE BEITIA, CLERK

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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

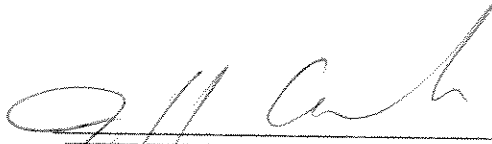
UNITED STATES OF AMERICA,	)	CR. NO. 04-00355SOM-01
	)	
Plaintiff,	)	
	)	MOTION FOR DOWNWARD
vs.	)	DEPARTURE; DECLARATION OF
	)	COUNSEL; MEMORANDUM IN
	)	SUPPORT OF MOTION;
RADINE KAWAHINE	)	CERTIFICATE OF SERVICE
KAMAKEA-OHELO,	)	
	)	Sentencing Date: February 21, 2006
Defendant.	)	Time of Hearing: 2:15 p.m.
	)	Judge: Honorable Susan Oki Mollway
	)	
	)	UNDER SEAL

MOTION FOR DOWNWARD DEPARTURE

COMES NOW the defendant, Radine Kamakea-Ohelo, by and through her court-appointed counsel, Jeffrey Arakaki, and moves this Honorable Court to depart downward from the sentencing range indicated in the relevant Presentence Investigation Report to a sentence that is sufficient but not greater than necessary" to address the issues of punishment, deterrence, and rehabilitation.

This motion is made pursuant to the United States Sentencing Guidelines Section 5K2.0, the Declaration of Counsel, the Memorandum in Support of Motion, and the information contained in the presentence investigation report.

DATED: Honolulu, Hawaii, February 15, 2006.

A handwritten signature in dark ink, appearing to read 'Jeff Arakaki', is written over a horizontal line.

JEFFREY ARAKAKI  
Attorney for Defendant  
RADINE KAMAKEA-OHELO